

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,	)	
	)	
v.	)	
	)	Crim. No. 17-201-01 (ABJ)
PAUL J. MANAFORT, JR.,	)	
	)	
Defendant.	)	

DEFENDANT PAUL J. MANAFORT, JR.'S MOTION FOR LEAVE  
TO FILE OPPOSITION TO GOVERNMENT'S MOTION TO MODIFY  
THE COURT'S SCHEDULE FOR RULE 404(b) NOTICE AND BRIEFING

Defendant Paul J. Manafort, Jr., by and through counsel, hereby moves for leave to file an opposition to the Government's Motion to Modify the Court's Schedule for Rule 404(b) Notice and Briefing ("Government's Motion"). (Dkt. # 155). The Government's Motion was filed in response to the Minute Order entered on January 17, 2018.

In the Court's order, the parties were instructed to "notify the Court if they have any objections to this schedule *as a whole* by January 19, 2018." See Jan. 17, 2018 Minute Order (emphasis supplied). The defendant understood the Court's order to mean that the scheduling order should be considered in toto, taking into account all filing deadlines for motions, the time allotted for oppositions and replies, etc. Simply put, the defendant understood that the parties should notify the Court only if they objected to the overall schedule – not to any specific deadlines. Otherwise, the words "as a whole" would be superfluous in the Minute Order.

The Government, however has moved to modify the scheduling order with respect to a specific deadline set forth in the overall schedule established by the Court; *i.e.*, the

notice and briefing of Rule 404(b) evidence. (Dkt. # 155). Accordingly, Mr. Manafort seeks leave to respond to the Government's Motion if the Court is inclined to consider the specific modification to its schedule as a whole, as set forth in the Minute Order dated January 17, 2018.

Dated: January 24, 2018

Respectfully submitted,

---

Kevin M. Downing  
(DC Bar # 1013984)  
Thomas E. Zehnle  
(DC Bar #415556)  
815 Connecticut Avenue  
Suite 730  
Washington, DC 20006  
(202) 754-1992